1

2

3

4

5

6

7

8

9

10

11

12

1314

15

16

17

18 19

20

2122

23

24

25

26

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JIKIRI BAUTISTA, an individual, ARI SILVA, an individual;

Plaintiffs,

v.

WFS EXPRESS, a Delaware corporation, CONSOLIDATED AVIATION SERVICES, a New York corporation; Defendants. No. 2:18-cv-00757 RSM

STIPULATED MOTION AND ORDER EXTENDING TEMPORARY STAY OF CASE FOR 14 DAYS

Plaintiffs Jikiri Bautista and Ari Silva ("Plaintiffs"), and Defendants WFS Express and Consolidated Aviation Services (collectively, the "Defendants") hereby move on a stipulated and agreed basis for an order extending the temporary stay in this case for an additional fourteen days. In support of this Stipulated Motion, Plaintiffs and Defendants state as follows:

- 1. On February 10, 2020, the Parties conducted a mediation with Judge Steve Scott, ret., but were ultimately unable to reach settlement.
- 2. Following the February 10, 2020 mediation, the Parties remained interested in reaching a mutually acceptable negotiated settlement, and discussions between the Parties' Counsels are ongoing.
- 3. The Parties agree that if they are simultaneously attempting to comply with Court deadlines and participate in motions practice, this would reduce their ability to constructively participate in settlement discussions.

STIPULATED MOTION AND ORDER EXTENDING TEMPORARY STAY OF CASE FOR 14 DAYS - 1 No. 2:18-cv-00757 RSM BADGLEY MULLINS TURNER PLLC

19929 Ballinger Way NE, Suite 200 Seattle, WA 98155 TEL 206.621.6566 FAX 206.621.9686

1	On the basis of the foregoing, the Parties request the Court enter an Order staying this	
2	action for all purposes for a period of at least 14 days so that the Parties may conduct additional	
3	settlement efforts.	
4	STIPULATED TO AND SUBMITTED this 13th day of March, 2020.	
5	BADGLEY MULLINS TURNER PLLC	DAVIS WRIGHT TREMAINE LLP
6 7 8 9 10 11	/s/Duncan C. Turner Duncan C. Tuner, WSBA #20597 Mark A. Trivett, WSBA #46375 19929 Ballinger Way NE, Suite 200 Seattle, WA 98155 Telephone: 206-621-6566 Email: dturner@badgleymullins.com Email: mtrivett@badgleymullins.com Attorneys for Plaintiffs	/s/ Kathryn S. Rosen Kathryn S. Rosen, WSBA #29465 920 Fifth Avenue, Suite 3300 Seattle WA 98104-1610 Telephone: 206-757-8134 Facsimile 206-757-7134 Email: katierosen@dwt.com Email: joewonderly@dwt.com Attorney for Defendant
12 13 14 15 16 17	ABEL M. TSEGGA, PLLC /s/Abel M. Tsegga Abel M. Tsegga, WSBA No. #46349 PO Box 5246, Lynnwood, WA 98046 144 Railroad Ave., #308 Edmonds, WA 98020 Telephone: 206-697-4878 Email: abel@tglawgrp.com Attorney for Plaintiffs	
18	v	
19		
20		
21		
22		
23		

24

25

26

TEL 206.621.6566 FAX 206.621.9686

ORDER

Having reviewed the Parties' Stipulated Motion for Order Extending Temporary Stay of
Case for 14 Days, the Court grants the motion for the good cause shown within and orders that
all litigation in this action is temporarily stayed for fourteen (14) days from the entry of this
order to enable the Parties to focus on and conduct additional settlement efforts. Upon
expiration of this temporary stay, the Parties shall file a status report confirming whether or not
they have reached a putative agreement.

IT IS SO ORDERED

DATED this 17 day of March, 2020.

RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE

STIPULATED MOTION AND ORDER EXTENDING TEMPORARY STAY OF CASE FOR 14 DAYS - 3
No. 2:18-cv-00757 RSM

BADGLEY MULLINS TURNER PLLC

19929 Ballinger Way NE, Suite 200 Seattle, WA 98155 TEL 206.621.6566 FAX 206.621.9686